

VIA ELECTRONIC FILING

October 23, 2023

The Honorable Gabriel W. Gorenstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

MEMORANDUM ENDORSED

**Re: Joint request for extension of discovery schedule
Tyler Erdman v. Adam Victor, et al., No. 20 Civ. 4162**

Dear Judge Gorenstein:

Plaintiff writes to request that the discovery deadline be extended from October 23rd to December 4th, and the letter to Judge Schofield as required by paragraph 13.b of Docket #77 be extended from October 30th to December 11th. The Court has previously granted numerous extensions with the most recent being on September 8th.

Plaintiff request this extension as he completed a review of what Defendant provided per the Court's September 7th order and found that Defendant has failed to comply with it in full. Among the issues, he failed to conduct a search to the present day, and he failed to explain multiple deficiencies such as why documents appear to be omitted from his production. The parties have discussed these issues and Plaintiff will be making a separate application within the next few days.

Mr. Rodriguez and Plaintiff spoke on October 23rd for approximately 20 minutes. He has agreed to this request.

The parties thank the Court for its attention to this matter.

Respectfully submitted,

The discovery deadline is extended to December 4, 2023. The letter to Judge Schofield as required by paragraph 13.b of Docket #77 shall be filed by December 11, 2023.

/s/Tyler Erdman
Plaintiff Pro Se
917-301-0401
Tyler@Erdman.it

So Ordered.



GABRIEL W. GORENSTEIN
United States Magistrate Judge

October 24, 2023